

Message

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**From:** Fields, Jenifer [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BA5842FD6C034D6986182F3F0954D257-FIELDS, JEN]  
**Sent:** 6/13/2018 6:01:59 PM  
**To:** Servidio, Cosmo (servidio.cosmo@epa.gov) [servidio.cosmo@epa.gov]  
**Subject:** FW: Please confirm ~ TSCA PCB remediation waste verse PCB containing materials

fyi

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**From:** Rodrigues, Cecil  
**Sent:** Wednesday, June 13, 2018 1:59 PM  
**To:** Fields, Jenifer <fields.jenifer@epa.gov>  
**Subject:** FW: Please confirm ~ TSCA PCB remediation waste verse PCB containing materials

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**From:** Jones, Satrina  
**Sent:** Wednesday, June 13, 2018 1:58 PM  
**To:** Rodrigues, Cecil <rodrigues.cecil@epa.gov>  
**Cc:** Lewis, Jacqueline <Lewis.Jacqueline@epa.gov>  
**Subject:** FW: Please confirm ~ TSCA PCB remediation waste verse PCB containing materials

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**From:** Sviben, Paula [mailto:psviben@pa.gov]  
**Sent:** Tuesday, June 12, 2018 2:53 PM  
**To:** Jones, Satrina <jones.satrina@epa.gov>  
**Subject:** RE: Please confirm ~ TSCA PCB remediation waste verse PCB containing materials

Hi Satrina,

Here are the names and emails for DEP staff attending. They will be arriving on AMTRAK at 0930 and heading to your office.

Thank you so much.

Paula

Ramez Ziadeh, [rziadeh@pa.gov](mailto:rziadeh@pa.gov)

George Hartenstein, [ghartenste@pa.gov](mailto:ghartenste@pa.gov)

Walt Harner, [wharner@pa.gov](mailto:wharner@pa.gov)

Ali Tarquino Morris, [altarquino@pa.gov](mailto:altarquino@pa.gov)

Susan Despot, [sdespot@pa.gov](mailto:sdespot@pa.gov)

Alexandra Chiaruttini, [achiarutti@pa.gov](mailto:achiarutti@pa.gov)

Robert Schena, [roschena@pa.gov](mailto:roschena@pa.gov)

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**From:** Jones, Satrina [<mailto:jones.satrina@epa.gov>]

**Sent:** Tuesday, June 12, 2018 2:27 PM

**To:** Sviben, Paula <[psviben@pa.gov](mailto:psviben@pa.gov)>

**Subject:** Please confirm ~ TSCA PCB remediation waste verse PCB containing materials

Good Afternoon Paula,

Hope you are having a great day. To confirm the meeting scheduled at EPA Region 3 on Tuesday, June 19<sup>th</sup> at 10:00 in Philadelphia EPA Office, please provide the name and emails of the attendees from PADEP. Each visitor will be required to provide a photo ID and pass through security for entry. Our building is located on the corner of 17<sup>th</sup> and Arch Streets (1650 Arch St.) Please enter through the Arch Street entrance and proceed past the security desk through the double doors. Please let me know if any special accommodations are needed.

Thank you,

SaTrina Jones

Program Support Assistant

**Environmental Protection Agency Region III**

**Land and Chemical Division**

1650 Arch Street

Philadelphia, PA 19103

[Jones.Satrina@EPA.gov](mailto:Jones.Satrina@EPA.gov)

Phone: 215-814-2994

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**From:** Sviben, Paula [<mailto:psviben@pa.gov>]

**Sent:** Tuesday, June 05, 2018 12:51 PM

**To:** Jones, Satrina <[jones.satrina@epa.gov](mailto:jones.satrina@epa.gov)>

**Subject:** RE: TSCA PCB remediation waste verse PCB containing materials

**Importance:** High

Neither of those work for DEP staff – would you send several more dates for consideration please and thank you.

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**From:** Jones, Satrina [<mailto:jones.satrina@epa.gov>]

**Sent:** Tuesday, June 05, 2018 11:53 AM

**To:** Sviben, Paula <[psviben@pa.gov](mailto:psviben@pa.gov)>

**Subject:** FW: TSCA PCB remediation waste verse PCB containing materials

Good Morning Paula,

EPA staff will not be able to meet on these suggested dates. Please consider Tuesday, June 26<sup>th</sup>, 11:00 am to 3:00 pm or Thursday, June 28<sup>th</sup>, morning or afternoon.

Thank you,

**SaTrina Jones**

Program Support Assistant  
**Environmental Protection Agency Region III**  
**Land and Chemical Division**  
1650 Arch Street  
Philadelphia, PA 19103

[Jones.Satrina@EPA.gov](mailto:Jones.Satrina@EPA.gov)  
Phone: 215-814-2994

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**From:** Rodrigues, Cecil  
**Sent:** Tuesday, June 05, 2018 11:41 AM  
**To:** Jones, Satrina <[jones.satrina@epa.gov](mailto:jones.satrina@epa.gov)>  
**Subject:** FW: TSCA PCB remediation waste verse PCB containing materials

FYI

Thanks,

Jacqueline R. Lewis  
Program Specialist  
3DRA00  
U. S. EPA, Region III  
1650 Arch Street  
Mailcode: 3DRA00  
Philadelphia, PA 19103  
215-814-2037  
[lewis.jacqueline@epa.gov](mailto:lewis.jacqueline@epa.gov)

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**From:** Sviben, Paula [<mailto:psviben@pa.gov>]  
**Sent:** Tuesday, June 05, 2018 10:40 AM  
**To:** Rodrigues, Cecil <[rodrigues.cecil@epa.gov](mailto:rodrigues.cecil@epa.gov)>  
**Subject:** FW: TSCA PCB remediation waste verse PCB containing materials

Good Morning!

I will be coordinating this meeting for DEP staff and have identified June 12, 19 or 20 as potential dates and am offering them for your consideration. I do not have an email address for your assistant, SaTrina Jones. Would you kindly forward this to her and we can work on confirming a date and time. Thank you.

Best Regards,  
Paula

**Paula J. Sviben** | Executive Secretary  
to Executive Deputy Secretary Ramez Ziadeh  
Department of Environmental Protection  
Rachel Carson State Office Building  
400 Market Street | Harrisburg, PA 17101  
Phone: 717.787.6490 | Fax: 717.705.4087  
[www.dep.pa.gov](http://www.dep.pa.gov)

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**From:** Ziadeh, Ramez  
**Sent:** Tuesday, June 05, 2018 9:25 AM  
**To:** Hartenstein, George <[ghartenste@pa.gov](mailto:ghartenste@pa.gov)>; Harner, Walter <[wharner@pa.gov](mailto:wharner@pa.gov)>; Tarquino Morris, Ali <[altarquino@pa.gov](mailto:altarquino@pa.gov)>; Despot, Susan <[sdespot@pa.gov](mailto:sdespot@pa.gov)>; Chiaruttini, Alexandra <[achiarutti@pa.gov](mailto:achiarutti@pa.gov)>  
**Cc:** McDonnell, Patrick <[pmcdonnell@pa.gov](mailto:pmcdonnell@pa.gov)>; Sviben, Paula <[psviben@pa.gov](mailto:psviben@pa.gov)>  
**Subject:** Fwd: TSCA PCB remediation waste verse PCB containing materials

EPA wants us to go to Philly to meet with them. Please coordinate your availability for a trip to Philly and get back to Paula with names and dates. Thanks everyone.

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**From:** Rodrigues, Cecil <[rodrigues.cecil@epa.gov](mailto:rodrigues.cecil@epa.gov)>  
**Sent:** Tuesday, June 5, 2018 9:16:13 AM  
**To:** Ziadeh, Ramez  
**Cc:** Armstead, John A.; Fields, Jenifer; Coe, Mary; Jones, Satrina  
**Subject:** RE: TSCA PCB remediation waste verse PCB containing materials

Ramez: we would like to have the meeting in our Philadelphia Office. I will have my assistant SaTrina Jones contact Aneca to help find some dates.

Cecil.

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**From:** Ziadeh, Ramez [<mailto:rziadeh@pa.gov>]  
**Sent:** Monday, June 04, 2018 3:17 PM  
**To:** Rodrigues, Cecil <[rodrigues.cecil@epa.gov](mailto:rodrigues.cecil@epa.gov)>  
**Cc:** Armstead, John A. <[Armstead.John@epa.gov](mailto:Armstead.John@epa.gov)>; Fields, Jenifer <[fields.jenifer@epa.gov](mailto:fields.jenifer@epa.gov)>; Coe, Mary <[Coe.Mary@epa.gov](mailto:Coe.Mary@epa.gov)>  
**Subject:** RE: TSCA PCB remediation waste verse PCB containing materials

Good afternoon Cecil,

We prefer to have a meeting with you and EPA Region III staff to discuss the PCB issue and next steps. Will you and your staff be willing to meet with us in Harrisburg? We can take the lead on scheduling this meeting in the next couple of weeks. Thanks.

Ramez

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**From:** Ziadeh, Ramez  
**Sent:** Thursday, May 31, 2018 4:24 PM  
**To:** 'Rodrigues, Cecil' <[rodrigues.cecil@epa.gov](mailto:rodrigues.cecil@epa.gov)>  
**Cc:** Armstead, John A. <[Armstead.John@epa.gov](mailto:Armstead.John@epa.gov)>; Fields, Jenifer <[fields.jenifer@epa.gov](mailto:fields.jenifer@epa.gov)>; Coe, Mary <[Coe.Mary@epa.gov](mailto:Coe.Mary@epa.gov)>  
**Subject:** RE: TSCA PCB remediation waste verse PCB containing materials

Thank you, Cecil. I will reach out to you next week to set up a follow call to discuss this issue.

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**From:** Rodrigues, Cecil [<mailto:rodrigues.cecil@epa.gov>]  
**Sent:** Wednesday, May 30, 2018 5:21 PM  
**To:** [rziadeh@pa.gov](mailto:rziadeh@pa.gov)  
**Cc:** Armstead, John A. <[Armstead.John@epa.gov](mailto:Armstead.John@epa.gov)>; Fields, Jenifer <[fields.jenifer@epa.gov](mailto:fields.jenifer@epa.gov)>; Coe, Mary <[Coe.Mary@epa.gov](mailto:Coe.Mary@epa.gov)>  
**Subject:** TSCA PCB remediation waste verse PCB containing materials

Ramez,

Following up on our call listed below is an explanation for the different limits for PCBs. Also attached are excerpts from *40 CFR Part 761, PCB Regulations* with highlights related to PCB Remediation Waste.

Generally, the 2 ppm addresses the use of PCB-containing materials. The 50 ppm does not address use. Rather, the 50 ppm addresses storage and disposal of PCB-containing materials.

**2 ppm:** PA regulations allow the use of PCB-containing materials as clean fill and regulated fill. PADEP's Clean Fill Policy allows the use of PCB-containing materials (including soil, gravel and concrete) as fill in an unrestricted manner. PADEPs' Beneficial Use Permit allows for the use of PCB-containing materials which exceed the levels in the Clean Fill policy as construction material.

The use of PCB-containing materials is banned under TSCA § 6(e)(2) unless authorized by EPA. EPA's use authorizations for PCBs and PCB-containing materials in 40 CFR 761.30 do not provide for the use of PCB-containing materials as fill or construction materials. Section 761.20(a) of the PCB regulations prohibit the use of PCBs at any concentration, other than in a totally enclosed manner, without an exemption. Any concentration is defined in the PCB regulations at Section 761.3 as the "quantifiable level/level of detection" which specifies 2 ppm.

**50 ppm:** 50 ppm is the concentration at which PCBs are regulated for storage and disposal under the PCB regulations. As defined in Section 761.3 of the PCB regulations, "PCB remediation waste" is materials which are currently at any concentration where the original source was greater than or equal to 50 ppm beginning on July 2, 1979; or materials which are currently at any concentration if the PCBs are spilled or released from a source not authorized for use under the PCB regulations. PCB remediation waste includes, but is not limited to, soil, concrete, gravel, sediment, buildings and other man-made structures, porous surfaces and non-porous surfaces. As per Section 761.50(b)(3), PCB remediation waste is regulated for cleanup and disposal in accordance with Section 761.61. Section 761.61(a)(5)(i)(B)(2)(ii) and (iii) and 761.61(b)(2) specify the manner of disposal of PCB remediation waste. The least stringent method for disposal of less than 50 ppm PCB remediation waste, with conditions, is a state permitted Subtitle D landfill.

If you have any questions, please give me a call. After you have a chance to review the materials please give me a call so that we can schedule a meeting to resolve this issue.

Thanks. Cecil.  
Cecil Rodrigues  
Deputy Regional Administrator (3DRA00)  
EPA Region III  
1650 Arch Street  
Philadelphia, PA 19103  
215.814.2683  
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